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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92057216
Party	Defendant Crown Manor Enterprises, LLC
Correspondence Address	CROWN MANOR ENTERPRISES LLC SUITE 200, 1200 PROSPECT STREET LA JOLLA, CA 92037 UNITED STATES
Submission	Answer
Filer's Name	Jeffrey L. Van Hoosear
Filer's e-mail	efiling@knobbe.com
Signature	/JVH/
Date	06/24/2013
Attachments	PCGH001N.pdf(107114 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

SIX CONTINENTS HOTELS, INC.,

Petitioner,

v.

CROWN MANOR ENTERPRISES, L.L.C.,

Respondent.

Cancellation No. 92057216

TM: CROWN MANOR

I hereby certify that this correspondence and all marked attachments are being deposited with the United States Patent and Trademark Office, Trademark Trial and Appeal Board via electronic filing through their website located at <http://esta.uspto.gov/> on:

June 24, 2013

(Date)



Jeffrey L. Van Hoosear

RESPONDENT'S ANSWER TO PETITION FOR CANCELLATION

Crown Manor Enterprises, L.L.C., ("Respondent") hereby answers the Petition for Cancellation filed by Six Continents Hotels, Inc. ("Petitioner") against U.S. Service Mark Registration No. 3,720,124 (the "Registration") for the mark CROWN MANOR as set forth below.

1. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
2. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
3. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
4. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
5. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
6. Admitted.
7. Admitted.

8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.
14. Admitted.
15. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
16. Admitted.
17. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
18. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
19. Denied.
20. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
21. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
22. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
23. Respondent does not have sufficient information to admit or deny the allegations and therefore Respondent denies the allegations.
24. Denied.
25. Denied.
26. Denied.
27. Denied.
28. Denied.
29. Denied.
30. Denied.

31. Denied.
32. No response of Respondent is required.
33. No response of respondent is required.

AFFIRMATIVE DEFENSES

1. Petitioner's claims in Petitioner's Petition for Cancellation are barred by laches.
2. There is no likelihood of confusion between Petitioner's CROWN PLAAZA Mark (as defined) as relied upon in the Petition for Cancellation and the CROWN MANOR mark of Respondent.
3. Petitioner does not own valid, subsisting trademark rights in the term "Crown" for "hotel services."

WHEREFORE, Crown Manor Enterprises, L.L.C. prays that Petitioner's Petition for Cancellation be dismissed in its entirety, and that Registration No. 3,720,124 remain valid and enforceable.

Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: June 24, 2013

By: 

Jeffrey L. Van Hoosear
2040 Main Street, 14th Floor
Irvine, CA 92614
Tel: (949) 760-0404
Fax: (949) 760-9502
Email: efiling@knobbe.com
Attorney for Respondent,
Crown Manor Enterprises, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **RESPONDENT'S ANSWER TO PETITION FOR CANCELLATION** upon Petitioner by depositing one copy thereof in the United States Mail, first-class postage prepaid on June 24, 2013 addressed as follows:

Sabina A. Vayner
Kilpatrick Townsend & Stockton LLP
1100 Peachtree Street, Suite 2800
Atlanta, Georgia 30309-4528


Betty de la Torre

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